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Attorneys for Plaintiff/Judgment Creditor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re:

SHERRY LEE ANNE RAYMOND,

Debtor.

(Chapter 7 Case)

No. 2:17-bk-12195-DPC

DALE D. ULRICH, CHAPTER 7
TRUSTEE,

Plaintiff/Judgment Creditor,

vs.

SHERRY LEE ANNE RAYMOND,

Defendant(s)/Judgment Debtor(s).

OLD REPUBLIC TAX SERVICE,

Garnishee.

**APPLICATION FOR WRIT OF
GARNISHMENT FOR EARNINGS OF
JUDGMENT DEBTOR**

Dale D. Ulrich, Trustee, Plaintiff and Judgment Creditor herein, by and through attorneys undersigned, hereby applies, pursuant to A.R.S. §12-1598.03, for a Writ of Garnishment for Earnings of SHERRY LEE ANNE RAYMOND (xxx-xx-9072) (“Judgment Debtor”). In support hereof, Trustee respectfully represents:

1. The Debtor in the above referenced bankruptcy case filed a Voluntary Petition under Chapter 7 of Title 11 on October 13, 2017.

2. Trustee is the duly appointed and acting trustee in this case and Plaintiff in this matter.

3. This Court entered an Order Directing Turnover of Property in favor of Trustee in this matter on November 27, 2018 [DE 24], in the principal sum \$6,031.26.

4. The total amount of \$6,031.26 remains due and owing to the Trustee from the Judgment Debtor, plus interest which has been accruing interest at the rate set forth in 28 U.S.C. §1961 since November 27, 2018 [DE 24].

5. Upon information and belief, Judgment Debtor is an employee of OLD REPUBLIC TAX SERVICE (“Garnishee”). Garnishee’s address is believed to be the following:

OLD REPUBLIC TAX SERVICE
3825 N 16th Street
Phoenix, AZ 85016

6. Trustee has not received notice of the Judgment Debtor's intent to enter into an agreement for debt scheduling with a qualified consumer credit counseling organization.

WHEREFORE, Dale D. Ulrich, Trustee respectfully requests that this Court issue a Writ of Garnishment for the earnings of SHERRY LEE ANNE RAYMOND, Judgment Debtor, as satisfaction of debt to the above referenced bankruptcy estate in the amount of \$6,031.26 plus interest at the rate set forth in 28 U.S.C. §1961 per annum.

RESPECTFULLY SUBMITTED this 14th day of June, 2019.

LANE & NACH, P.C.

By /s/ MPL #007435
Michael P. Lane
Attorneys for Plaintiff/Judgment Creditor

COPY of the foregoing mailed/delivered via electronic notification to:

Office of U.S. Trustee
230 North First Avenue
Phoenix, AZ 85003
Email: ustpreion14.px.ecf@usdoj.gov

By/s/ S. Rochin